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November 23, 2022

VIA ECF

Magistrate Judge Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Santamaria v. Homemade Taqueria Corp., et al.*
21 Civ. 3562 (NM)(SJB)

Dear Judge Bulsara:

We represent Plaintiff in the above-referenced matter and submit this letter jointly with counsel for Defendants to request a two-week extension of discovery that is set to conclude on December 1, 2022 to allow the parties additional time to complete depositions and engage in settlement discussions.

As the Court is aware, the parties stipulated to conditional certification of an FLSA collective action on July 15, 2022. ECF No. 25. Notice was mailed to the putative members of the FLSA Collective, and the opt-in period concluded on October 11, 2022, without any putative members opting into the Action. Since then, the parties have engaged in good faith discussions regarding the resolution of Plaintiff's claims and believe that a potential settlement may be reached between counsel. Concurrent with settlement discussions, the parties are also concluding document production and have scheduled depositions of the parties. Defendants' deposition is noticed for November 30, and Plaintiff's deposition is noticed for December 7, 2022. The parties make this joint request so that we have sufficient time to engage in settlement discussions, and in the alternative to conclude depositions.

The parties previously requested an extension of discovery on March 15, 2022 in conjunction with a joint letter motion for the parties to brief the scope of the collection action. *See* ECF No. 19. The parties requested an amended discovery schedule on July 17, 2022, to allow for the completion of the collective action opt-in period. *See* Minute Entry entered on July 16, 2022.

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We thank the Court for its time and consideration and remain available to provide additional information if needed.

Respectfully submitted,

s/Vivianna Morales

Vivianna Morales

cc: All Counsel of Record (via ECF)